IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

BRYCE BROWN,	§
Plaintiff,	§ § 8
v.	§ CIVIL ACTION NO. 4:24-cv-05036
CHANDRESH PATEL, ET AL.	§ §
Defendant,	§ §
G&A OUTSOURCING III LLC., DBA	§ §
ONPOINT LAB, ET AL.	§ JURY TRIAL DEMANDED
Defendant.	8

DEFENDANTS' OPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

Defendants G&A Outsourcing III, LLC (G&A), OnPoint Lab, L.L.C., (OnPoint), and Chandresh Patel (Patel) (collectively Defendants)¹, respectfully move the Court to grant a three-week extension to February 24, 2025, of the deadline to respond to the Amended Complaint filed by Plaintiff Bryce Brown (Plaintiff). In support of its motion, Defendants submit the following:

- 1. On December 20, 2024, Plaintiff filed his Original Complaint. [Doc. 1].
- 2. On January 10, 2025, Plaintiff filed his Amended Complaint. [Doc. 4].
- 3. Defendants have just retained the undersigned counsel to represent them in this matter as of this week. As newly hired counsel for Defendants, Defendants seek a brief three-week

¹ Plaintiff erroneously named the legal entities in this case as "G&A Outsourcing III LLC., DBA OnPoint Lab, et al." Plaintiff refers to two separate entities: (i) G&A Outsourcing III, LLC, and (ii) OnPoint Lab, L.L.C. The undersigned counsel represent both legal entities, along with individual defendant Chandresh Patel.

extension until February 24, 2025, to file an answer, motion, or otherwise respond to Plaintiff's Amended Complaint.

- 4. Plaintiff is subject to an Arbitration Agreement. The additional time until February 24, 2025, would also allow the Parties to have meaningful discussions regarding Plaintiff's obligations under the Arbitration Agreement.
- 5. The undersigned counsel conferred with Plaintiff on January 30, 2025, via telephone and asked if Plaintiff would oppose Defendants seeking an extension from the Court to respond to his Amended Complaint. Plaintiff refused to agree to an extension of time.
- 6. Defendants file this Motion in advance of the expiration of the response deadline. This motion is made in good faith and not for the purposes of undue delay. If the Court grants this opposed motion, no other deadlines in this case will be impacted.

WHEREFORE, Defendants respectfully move this Court to extend the time in which it may respond to Plaintiff's Amended Complaint by three weeks, to February 24, 2025.

Dated: January 31, 2025

Of Counsel:

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Respectfully submitted,

/s/ G. Mark Jodon

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ATTORNEYS FOR DEFENDANTS G&A OUTSOURCING III, LLC, ONPOINT LAB, L.L.C., AND CHANDRESH PATEL

CERTIFICATE OF CONFERENCE

I hereby certify that on the 30th day of January, 2025, I conferred with counsel via telephone as to whether Plaintiff was opposed or unopposed to the filing of this motion and Plaintiff confirmed that he is opposed to filing same.

/s/ Daniel Coolidge
Daniel Coolidge

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2025, a true and correct copy of the foregoing was electronically filed and served on all counsel of record by the Court's ECF system, including:

Bryce Brown 935 N. Wilcrest Dr. Apt. 1018 Houston, TX 77079 Brycebrown19@gmail.com (281) 763-8151

/s/ Daniel Coolidge
Daniel Coolidge